

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

LISA ABELES,

Plaintiff,

V.

PUGET SOUND COLLECTIONS, INC.;
TRANS UNION LLC, a Delaware limited
liability company; and EQUIFAX
INFORMATION SERVICES LLC, a Georgia
limited liability company,

Defendants.

No. 2:21-cv-01384-RSL

DEFENDANT EQUIFAX
INFORMATION SERVICES LLC'S
UNOPPOSED MOTION FOR RELIEF
FROM DEADLINE TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT

Defendant Equifax Information Services LLC (“Equifax”), by their attorneys and pursuant to Local Rules 7 and 10 of the Western District of Washington, hereby submits this Unopposed Motion for Relief from Deadline to Answer or Otherwise Respond to Plaintiff’s Complaint. In part of its motion, Equifax states as follows:

1. On September 24, 2021, Plaintiff Lisa Abeles served Equifax with a Summons and Complaint to be filed in the King County Superior Court, State of Washington.

2. On October 12, 2021, Defendant Trans Union, LLC timely filed its Notice of Removal (ECF No. 1).

EQUIFAX UNOPPOSED MOTION FOR RELIEF
FROM DEADLINE - 1
(NO. 2:21-CV-01384-RSL)

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3. Pursuant to Rules 12 and 81(c)(2) of the Federal Rules of Civil Procedure, Equifax currently must file its responsive pleading by October 19, 2021.

4. On October 7, 2021, counsel for Equifax conferred with Plaintiff's counsel to confirm that Plaintiff had no objection to extending Equifax's deadline to answer or respond to Plaintiff's Complaint in the removed action to November 29, 2021. Plaintiff's counsel confirmed that Plaintiff consents to Equifax's requested extension.

5. Thus, to allow Equifax additional time to investigate Plaintiff's allegations, Equifax respectfully requests an extension of time to answer or respond to Plaintiff's Complaint through and including November 29, 2021.

6. This motion is filed before Equifax's response to Plaintiff's Complaint is due. Equifax's request is not sought for the purpose of delay, nor will the additional time adversely affect the just, speedy, and inexpensive determination of this action. See Fed. R. Civ. P. 1.

7. This motion is filed in good faith and is supported by good cause.

WHEREFORE, Equifax respectfully requests the Court to issue an Order extending the time for Equifax to answer or otherwise respond to Plaintiff's Complaint through and including November 29, 2021.

Respectfully submitted this 15th day of October, 2021.

SEYFARTH SHAW LLP

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*Counsel for Defendant
Equifax Information Services LLC*

EQUIFAX UNOPPOSED MOTION FOR RELIEF
FROM DEADLINE - 2
(NO. 2:21-CV-01384-RSL)

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1 IT IS SO ORDERED.
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Dated this 18th day of October, 2021.

Robert S. Lasnik

5 THE HONORABLE ROBERT S. LASNIK
6 UNITED STATES DISTRICT JUDGE
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EQUIFAX UNOPPOSED MOTION FOR RELIEF
FROM DEADLINE - 3
(NO. 2:21-CV-01384-RSL)

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